

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

D. A., A.A., and Lucinda del Carmen	)	
Padilla-Gonzales,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 20-cv-3082
	)	
The United States of America, Heartland	)	
Alliance for Human Needs and Human	)	Hon. Martha M. Pacold
Rights, and Heartland Human Care Services,	)	
Inc.,	)	
	)	
Defendants.	)	

**MOTION TO DISMISS THE HEARTLAND DEFENDANTS**

1. Pursuant to the settlement agreement reached between Plaintiffs and Defendants Heartland Alliance for Human Needs and Human Rights, and Heartland Human Care Services, Inc. (the Heartland Defendants), Plaintiffs move to dismiss their claims against the Heartland Defendants with prejudice.
2. Nothing in this motion to dismiss is intended to alter or affect any of Plaintiffs' remaining claims against the United States of America.

Respectfully submitted,

/s/ Sarah Grady  
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/s/ Kurt Mathas

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**CERTIFICATE OF SERVICE**

I, Sarah Grady, an attorney, hereby certify that on March 4, 2022, I caused a copy of the foregoing to be filed using the Court's CM/ECF system, which effected service on all counsel of record.

/s/ Sarah Grady \_\_\_\_\_

Sarah Grady  
Attorney for Plaintiffs